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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Time-Critical Removal Action – Former Plainwell Impoundment
Monthly Report (July 2007)

INDUSTRIAL

Dear Sam:

Date:

August 15, 2007

Attached is the fifth monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action. This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-C-863).

Contact:

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If you have any questions, please do not hesitate to contact me.

Email:

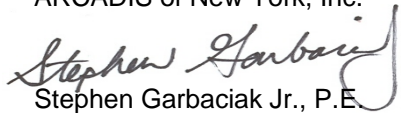
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Sincerely,

Our ref:

B0064530.670

ARCADIS of New York, Inc.


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Imagine the result

**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
TIME-CRITICAL REMOVAL ACTION (TCRA) – FORMER PLAINWELL IMPOUNDMENT**

REPORT #5, JULY 2007

**PREPARED BY ARCADIS BBL
AUGUST 15, 2007**

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP

SUBMITTED TO

**SAMUEL BORRIES, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/
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Significant Developments and Activities During the Period

- On July 2, the United States Environmental Protection Agency (USEPA) submitted a draft letter to the Kalamazoo River Study Group (KRSB) describing proposed removal activities to be performed on the City of Plainwell property upstream of Removal Area 2B.
- On July 9, the Michigan Department of Transportation (MDOT) granted the KRSB permission to access the Highway 131 bridge right-of-way in Plainwell, Michigan.
- On July 9, the Michigan Department of Environmental Quality (MDEQ) submitted to the USEPA and to the KRSB results of sediment sampling activities conducted in Removal Area 1 on July 2 and July 3.
- On July 10, the KRSB submitted a copy of the MDOT letter regarding permission to access the Highway 131 right-of-way to the USEPA.
- On July 10, the MDEQ submitted a map of the July 2 and July 3 sediment sampling locations to the USEPA and to the KRSB.
- On July 10, the USEPA issued a letter to the KRSB titled *Removal Area 2B (additional removal on City of Plainwell property)* that describes the need to remove approximately 450 linear feet of material located upstream of and adjacent to Removal Area 3B.
- On July 11, the USEPA issued a letter to the KRSB titled *Modification to Former Plainwell Impoundment Area Time-Critical Removal Action Design Report to Require the Removal of Additional Near-Shore Sediment in Removal Area 1*, describing an additional sediment deposit located between control points 128 and 131 to be removed from Removal Area 1.
- On July 16, the KRSB submitted the fourth *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for June 2007 to the USEPA.
- On July 16, the KRSB submitted a Subcontractor Qualification Notification for The King Company, Inc. to the USEPA, as required by Paragraph 11 of the TCRA AOC.
- On July 18, the USEPA submitted formal e-mail notification to the KRSB that management of the project has been formally transferred to Jim Saric.
- On July 27, the KRSB submitted copies of the *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for February/March, April, May, and June to the MDEQ.
- On July 30, the KRSB submitted a copy of the 12th *Weekly Construction Report for the Plainwell TCRA* to the USEPA.

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- On July 31, the USEPA submitted copies of analytical data for the four sediment split samples collected to date to the KRSG.
- On July 2, July 16, July 23 and July 30, the KRSG transmitted copies of analytical data from TCRA sampling activities to the USEPA.
- By July 31, the KRSG had obtained property access agreements, as required by Paragraph 23 of the TCRA AOC (Table A), from eight property owners. No access agreements were obtained in July.
- Severn Trent Laboratories, Inc. – Burlington (STL Burlington) is now known as TestAmerica Laboratories, Inc. – Burlington (TAL Burlington).

Data Collected and Field Activities Conducted During the Period

- During the week of July 2, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, staking excavation limits, and installing site security measures), completed excavation of Removal Area 1, completed excavation of TSCA-material at Removal Area 2A, and finished backfilling Removal Area 1 at the former Plainwell Impoundment. Soil samples K25715, K25716 and K25717 were collected every two hundred feet from the future location of the access road between Michigan Highway 89 and Staging Area 2S. Prior to discharge, wastewater samples W_SA1N_Influ_0001, W_SA1N_MidA_0001 and W_SA1N_Efflu_0001 were collected from the influent, the midpoint, and the effluent of the water treatment system located at Staging Area 1N. Two surface water samples (K30621 and K30622) were collected from locations 300 feet downstream and 100 feet upstream, respectively, of Removal Area 2A for PCB analysis. A rinse blank (K30623) was also collected. Table B summarizes the samples collected. Solidification of the excavated material continued at Staging Area 1N using a pug mill with cement, and the solidified material from the pug mill was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) or Wayne Landfill in Belleville, Michigan (TSCA material) for disposal.
- During the week of July 9, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, staking excavation limits, and installing site security measures), began relocating concrete stockpiles on the Aggregate Industries property in order to construct Staging Area 5S, discharged the first batch of treated water, completed removal activities in Removal Areas 2A and 3A, completed removal activities at Upland Area 3A2, excavated a sediment deposit in Removal Area 1 as instructed by the USEPA, and began excavation in Removal Area 4A at the former Plainwell Impoundment. Eight sediment confirmation samples (K55248 through K55255) were collected from Removal Areas 2A and 3A for PCB analysis. Two surface water samples (K30624 and K30625) were collected from locations 300 feet downstream and 100 feet upstream, respectively, of Removal Area 3A for PCB analysis. A rinse blank (K30626) was also collected. Table B summarizes the samples collected. Solidification of the excavated material continued at Staging Area 1N using a pug mill with cement, and the solidified material from the pug mill was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) or Wayne Landfill in Belleville, Michigan (TSCA material) for disposal.

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- During the week of July 16, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, staking excavation limits, and installing site security measures), completed removal activities in Removal Area 4A and Upland Area 3A1, and performed additional removal activities in Removal Area 1 of the former Plainwell Impoundment. Eleven sediment confirmation samples (K55256 through K55259 and K55261 through K55267) and one duplicate sample (K55260) were collected from Removal Areas 3A and 4A for PCB analysis. The USEPA collected split samples of samples K55256 and K55263. Two surface water samples (K30627 and K30628) were collected from locations 300 feet downstream and 100 feet upstream, respectively, of Removal Area 4A for PCB analysis. A rinse blank (K30629) and a sample of topsoil (K25718) were also collected. Table B summarizes the samples collected. Solidification of the excavated material continued at Staging Area 1N using a pug mill with cement, and the solidified material from the pug mill was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) or Wayne Landfill in Belleville, Michigan (TSCA material) for disposal.
- During the week of July 23, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, staking excavation limits, and installing site security measures), began installation of Staging Area 2S, continued excavation in Removal Area 4A, and began excavation in Removal Area 6A at the former Plainwell Impoundment. An additional eight inches of sediment was excavated from Upland Area 3A2. Three sediment confirmation samples (K55268 through K55270) were collected from Removal Areas 4A and Upland Areas 3A1 and 3A2 for PCB analysis. Two surface water samples (K30630 and K30631) were collected from locations 300 feet downstream and 100 feet upstream, respectively, of Removal Area 4A for PCB analysis. A rinse blank (K30632) was also collected. Soil samples (K25719 through K25726) were collected at 200-foot intervals from the access road leading from Staging Area 2S to Removal Areas 2B, 3B, and 4B. A composite sample (K25727) was collected from the four corners and center of Staging Area 2S. Table B summarizes the samples collected. Solidification of the excavated material continued at Staging Area 1N using a pug mill with cement, and the solidified material from the pug mill was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) or Wayne Landfill in Belleville, Michigan (TSCA material) for disposal.
- On July 31, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, staking excavation limits, and installing site security measures), completed the installation of Staging Area 2S, continued excavation in Removal Area 6A, and began excavation in Removal Area 5A at the former Plainwell Impoundment. Waste water samples W_SA1N_Influ_0002, W_SA1N_MidA_0002 and W_SA1N_Efflu_0002 were collected from the influent, the midpoint, and the effluent of the water treatment system located at Staging Area 1N prior to discharge. No additional samples were collected. Solidification of the excavated material continued at Staging Area 1N using a pug mill with cement, and the solidified material from the pug mill was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) or Wayne Landfill in Belleville, Michigan (TSCA material) for disposal.

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Laboratory Data Received During the Period

- During the week of July 2, the KRSG received laboratory data for surface water samples K30615 through K30617 (which were collected in June) and waste water samples W_SA1N_Influ_0001, W_SA1N_MidA_0001 and W_SA1N_Efflu_0001 (Table B).
- During the week of July 9, the KRSG received laboratory data for surface water samples K30618 through K30620 (which were collected in June), sediment confirmation samples K55248 through K55255, and pre-construction access road samples K25715, K25716 and K25717 (Table B).
- During the week of July 16, the KRSG received laboratory data for surface water samples K30621 through K30623 and sediment confirmation samples K55256 through K55267 (Table B).
- During the week of July 23, the KRSG received laboratory data for surface water samples K30624 through K30626, sediment confirmation samples K55268 through K55270, and topsoil sample K25718 (Table B).
- On July 31, the KRSG received analytical data for waste water samples W_SA1N_Influ_0002, W_SA1N_MidA_0002 and W_SA1N_Efflu_0002 and PCB analytical data for the USEPA split samples of confirmation sediment samples K55256 and K55263. The USEPA also split sample W_SA1N_Efflu_0002; the analytical data for this sample has not been received.
- The KRSG is awaiting analytical results for surface water samples K30627 through K30632, soil samples K25719 through K25727 and the USEPA split sample of W_SA1N_Efflu_0002.

Issues Encountered and Actions Taken

- On July 2, field personnel observed that the silt curtain near the upstream end of Removal Area 2A had become unfastened from the riverbed. Crews immediately repaired the silt curtain prior to the commencement of any removal activities in the Area. No elevated turbidity readings were observed.
- On July 2 and July 3, the MDEQ collected sediment samples from locations near Removal Areas 1 and 2A where the MDEQ had observed soft sediment deposits. These areas were not included in the original scope of TCRA activities. The MDEQ reported that they used both biased and non-biased sampling techniques. On July 10, results of the July 2 and July 3 MDEQ sediment sampling near Removal Area 1 were submitted to the USEPA and to the KRSG. According to the data, elevated PCB concentrations were detected in the sediment located between TCRA River Mark 70+50 and 72+25, near control points 128 and 131. On July 11, the USEPA issued a letter informing the KRSG that the above-referenced material must be removed. This material was excavated on July 14. According to the USEPA letter, the KRSG was not required to collect sediment confirmation samples from this area.

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- On July 6, crews observed kayakers near the upstream portion of Removal Area 1. John Lerg of the Michigan Department of Natural Resources (MDNR) was immediately notified.
- Excavation of Grids 6 and 7 in Removal Area 3A was completed on July 11. Field personnel observed soft sediments remaining in the area upon the completion of removal activities. The decision was made to remove the sediments prior to collecting confirmation samples in the area. This material was removed on July 13, and sediment confirmation samples (K55256 and K55267) were collected on July 16.
- On July 14, a visible silt plume was identified leaving Removal Area 1 and entering the river during removal activities. Work was immediately halted so that the turbidity curtain could be inspected. According to the investigation, water and silt were leaving the work area through a seam in the turbidity curtain, where two curtains merge together. It was concluded that the silt plume was the result of the design of the turbidity curtain and not the result of incorrect installation of the turbidity curtain. As such, there was no way to fix the curtain. Turbidity readings were closely monitored for the remainder of the day. No elevated readings were observed.
- On July 17, KRSG field personnel and the USEPA contractor walked Removal Area 1 near control points 128 and 131, the site of the July 14 removal activities. Soft sediment deposits with a thickness exceeding six inches were observed outside of the excavated area. The USEPA informed the KRSG that approximately ten linear feet of material would have to be excavated upstream of control point 131 and downstream of control point 128. This material was excavated on July 20, and after KRSG field personnel and the USEPA contractor walked the excavated area to ensure completion of removal activities, the USEPA approved the completion of removal activities via telephone.
- On July 19, Sample K55267 was collected from Removal Area 4A, Grid 5. According to the laboratory results, a PCB concentration of 7.5 mg/kg was detected in the sample. On July 20, an additional 6 inches of material was removed from this area, and sample K55268 was collected on July 24. A PCB concentration of 4.8 mg/kg was detected in sample K55268. This concentration was determined to be within the margin of error of the action limit of 5 mg/kg, so in order to ensure completeness of removal activities, all remaining soft sediments in Removal Area 4A, Grid 5 were excavated on July 26. Upon completion of excavation, field personnel attempted to collect a confirmation sample; however, the sand and gravel riverbed did not yield a sample. The USEPA On-Scene Coordinator was onsite on July 30 and approved the completeness of removal activities in Removal Area 4A.
- On July 21, field personnel located near Removal Area 6A observed campers on the south bank of the river. The campers quickly departed the area upon visual contact with field personnel. However, the campers did not properly extinguish their fire. KRSG personnel quickly extinguished the fire before it could spread to the dry, vegetated area around the campsite.
- On July 21, large pieces of concrete were observed along First Avenue and Main Street, near downtown Plainwell. It was concluded that the concrete had fallen from one of the trucks transporting

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concrete from Aggregate Industries on 12th Street to the First Avenue work site. The concrete was immediately removed from the streets. No public complaints were received.

- On July 23, the dust action limit was reached in Removal Area 4B during clearing and grubbing activities. Work was immediately halted and a water truck was used to suppress the dust in the area before work resumed. No additional incidents were noted.
- On July 23, an unknown vehicle was observed within the exclusion zone near Staging Area 1N. On-site personnel requested that the vehicle be properly decontaminated and immediately leave the area. The driver was reportedly uncooperative and left the work zone without decontaminating his vehicle. The vehicle license plate was recorded for future reference.
- On July 23, water was observed to be flowing over the turbidity curtain and into Removal Area 4A. Removal activities were immediately halted while the turbidity curtain was repaired. No elevated turbidity readings were observed.
- On July 24, the MDEQ collected sediment samples from areas both inside and outside the excavation limits of Removal Area 4A, and on July 25, samples were collected from Removal Area 1. The MDEQ attempted to collect samples from the same locations as were sampled on July 2 and July 3, prior to the additional excavation of Removal Area 1 near control points 128 and 131. Sample collection locations were identified at the discretion of the MDEQ and samples were collected using Lexan tubing. Sample intervals within the core were selected based on visual observations and recovery, sediment intervals, sediment description, and sample location were recorded. All samples were submitted to a laboratory for PCB analysis. Analytical results have not yet been provided by the MDEQ. According to the MDEQ, the samples are being collected in order to test the effectiveness of removal and not as a means to require the removal of additional materials.
- On July 24, confirmation sample K55270 was collected from Upland Area 3A2. According to laboratory data, a PCB concentration of 26 mg/kg was detected in the sample. Approximately eight additional inches of material was removed from Upland Area 3A2 on July 27. A confirmation sample in Upland Area 3A2 is scheduled to be collected during the week of August 6.
- On July 26, a visible silt plume was identified near Removal Area 5A during excavation of Removal Area 4A. Work was immediately halted so the source of the silt plume could be identified. During this time, the MDEQ collected a water column sample near the turbidity curtain. Analytical results have not yet been provided by the MDEQ. Field personnel identified and repaired the source of the silt plume prior to recommencing removal activities. Later that day, a visible silt plume was identified near Removal Area 6A during excavation of that Area. Removal activities were immediately halted while the turbidity curtain was repaired. No elevated turbidity readings were observed.

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- On July 27, a visible silt plume was identified once again near Removal Area 6A. Breaches of the turbidity curtain were observed throughout the day. Removal activities were immediately halted while the turbidity curtain was repaired, and no elevated turbidity readings were observed.
- On July 27, anglers were observed near the Plainwell Dam. Field personnel spoke with the anglers and requested that they do not fish in this area for the duration of work activities. The anglers initially refused to leave, but eventually complied and left the work area.

Developments Anticipated During the Next Reporting Period

- During the week of August 1, the KRSG is scheduled to complete the excavation of Removal Area 6A, continue the excavation of Removal Area 5, continue to receive sheet piling for Phase 1 cofferdam installation, and begin the construction of Staging Area 5S.
- During the week of August 6, the KRSG is scheduled to continue excavation of Removal Area 5 and Island 3, begin the installation of a temporary dock near the Plainwell Dam, collect sediment samples from Upland Area 3A2, Removal Areas 5 and 6A, and Island 3, and begin the construction of an access road from the Plainwell Dam to Staging Area 5S.
- During the week of August 13, the KRSG is scheduled to complete the restoration of Removal Areas 5 and 6A and begin removal activities on the south side of the Kalamazoo River.
- During the week of August 20, the KRSG plans to hold a Monthly Stakeholders Meeting, to continue removal activities on the south side of the river, and to continue restoration activities on the north side of the river.
- During the week of August 27, the KRSG is scheduled to complete the installation of the Phase I cofferdam, to continue removal activities on the south side of the river, and to continue restoration activities on the north side of the river.
- Throughout August, the KRSG will continue to negotiate property access agreements as required by Paragraph 23 of the TCRA AOC (Table A).
- Throughout August, the KRSG will, as necessary, continue to submit Subcontractor Qualification Notifications to the USEPA, as required by Paragraph 11 of the TCRA AOC.

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Time-Critical Removal Action - Former Plainwell Impoundment
Monthly Report #5, July 2007

Table A — Summary of Property Access Agreements (as of July 31, 2007)

| Date Sent | Property Owner | Status |
|------------------|---|-----------------|
| 3/19/2007 | A.C. Geenen Associates | no response |
| 3/9/2007 | Aggregate Industries (Bill Smith Sand and Gravel) | accepted |
| 3/9/2007 | Allen Robinson | accepted |
| 3/9/2007 | Balkema Excavating | accepted |
| 3/9/2007 | Brad Keeler | accepted |
| 3/9/2007 | City of Plainwell | accepted |
| 3/26/2006 | Consumers Energy | in negotiations |
| 3/9/2007 | Meijer, Inc. | in negotiations |
| 3/21/2007 | Plainwell Group LLC | no response |
| 3/16/2007 | Robert Foster Trust | rejected |
| 3/9/2007 | Robert Keeler Trust | accepted |
| 3/9/2007 | Rolfe Family Trust | accepted |
| 3/16/2007 | Shirley Foster | no response |
| 3/9/2007 | Steven Peterson | accepted |

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
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Table B — Summary of Samples Collected and Data Received in July 2007

| Sample ID | Sample Date | Data Received | Sample Delivery Group | Laboratory | Sample Matrix | Sample Location | Analysis Conducted | PCB Result (mg/kg) | PCB Action Limit (mg/kg) | Response Action |
|-------------------|-------------|---------------|-----------------------|------------|---------------|--|--------------------|--------------------|--------------------------|---|
| K30615 | 06/21/07 | 07/02/07 | 072574 | KAR Labs | Surface Water | 300' downstream of RA 1A | PCBs | <0.0001 mg/L | 2e-4 mg/L | None |
| K30616 | 06/21/07 | 07/02/07 | | | Surface Water | 100' upstream of RA 1A | PCBs | <0.0001 mg/L | 2e-4 mg/L | None |
| K30617 | 06/21/07 | 07/02/07 | | | Rinse Blank | - | PCBs | <0.0001 mg/L | 2e-4 mg/L | None |
| K30618 | 06/28/07 | 07/12/07 | 072697 | KAR Labs | Surface Water | 300' downstream of RA 1A | PCBs | <0.0001 mg/L | 2e-4 mg/L | None |
| K30619 | 06/28/07 | 07/12/07 | | | Surface Water | 100' upstream of RA 1A | PCBs | <0.0001 mg/L | 2e-4 mg/L | None |
| K30620 | 06/28/07 | 07/12/07 | | | Rinse Blank | - | PCBs | <0.0001 mg/L | 2e-4 mg/L | None |
| W_SA1N_Influ_0001 | 07/03/07 | 07/05/07 | 072762 | KAR Labs | Waste Water | Influent Port, Monitoring Point 001A, Staging Area 1N | PCBs, TSS | <0.0001 mg/L | 2e-4 mg/L | None: TSS = 1 mg/L, Action Limit = 45 mg/L |
| W_SA1N_MidA_0001 | 07/03/07 | 07/05/07 | | | Waste Water | Mid-Point Left Side, Monitoring Point 001A, Staging Area 1N | PCBs, TSS | <0.0001 mg/L | 2e-4 mg/L | None: TSS = 12 mg/L, Action Limit = 45 mg/L |
| W_SA1N_Efflu_0001 | 07/03/07 | 07/05/07 | | | Waste Water | Effluent Port, Monitoring Point 001A, Staging Area 1N | PCBs, TSS | <0.0001 mg/L | 2e-4 mg/L | None: TSS = 5 mg/L, Action Limit = 45 mg/L |
| K25715 | 07/03/07 | 07/12/07 | 072763 | KAR Labs | Soil | Access road on City of Plainwell property (200-foot intervals) | PCBs | <0.330 | - | None |
| K25716 | 07/03/07 | 07/12/07 | | | Soil | | PCBs | <0.330 | - | None |
| K25717 | 07/03/07 | 07/12/07 | | | Soil | | PCBs | <0.330 | - | None |
| K30621 | 07/06/07 | 07/17/07 | 072808 | KAR Labs | Surface Water | 300' downstream of RA 2A | PCBs | <0.0001 mg/L | 2e-4 mg/L | None |
| K30622 | 07/06/07 | 07/17/07 | | | Surface Water | 100' upstream of RA 2A | PCBs | <0.0001 mg/L | 2e-4 mg/L | None |
| K30623 | 07/06/07 | 07/17/07 | | | Rinse Blank | - | PCBs | <0.0001 mg/L | 2e-4 mg/L | None |
| K55248 | 07/09/07 | 07/10/07 | 072817 | KAR Labs | Sediment | RA 2A, Grid 1 | PCBs | <0.330 | 5 | None |
| K55249 | 07/09/07 | 07/10/07 | | | Sediment | RA 2A, Grid 2 | PCBs | <0.330 | 5 | None |
| K55250 | 07/09/07 | 07/10/07 | | | Sediment | RA 2A, Grid 6 | PCBs | <0.330 | 5 | None |
| K55251 | 07/10/07 | 07/11/07 | 072837 | KAR Labs | Sediment | RA 3A, Grid 1 | PCBs | <0.330 | 5 | None |
| K55252 | 07/10/07 | 07/11/07 | | | Sediment | RA 3A, Grid 2 | PCBs | <0.330 | 5 | None |
| K55253 | 07/10/07 | 07/11/07 | | | Sediment | RA 3A, Grid 3 | PCBs | <0.330 | 5 | None |
| K55254 | 07/10/07 | 07/11/07 | | | Sediment | RA 3A, Grid 4 | PCBs | <0.330 | 5 | None |
| K55255 | 07/10/07 | 07/11/07 | | | Sediment | RA 3A, Grid 5 | PCBs | <0.330 | 5 | None |

Kalamazoo River Study Group
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Time-Critical Removal Action - Former Plainwell Impoundment
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Table B — Summary of Samples Collected and Data Received in July 2007

| Sample ID | Sample Date | Data Received | Sample Delivery Group | Laboratory | Sample Matrix | Sample Location | Analysis Conducted | PCB Result (mg/kg) | PCB Action Limit (mg/kg) | Response Action | | |
|---------------------|-------------|---------------|-----------------------------|--|---------------|--------------------------|---|--------------------|--------------------------|---|--|--|
| K30624 | 07/12/07 | 07/26/07 | 072888 | KAR Labs | Surface Water | 300' downstream of RA 3A | PCBs | <0.0001 mg/L | 2e-4 mg/L | None | | |
| K30625 | 07/12/07 | 07/26/07 | | | Surface Water | 100' upstream of RA 3A | PCBs | <0.0001 mg/L | 2e-4 mg/L | None | | |
| K30626 | 07/12/07 | 07/26/07 | | | Rinse Blank | - | PCBs | <0.0001 mg/L | 2e-4 mg/L | None | | |
| K55256 ¹ | 07/16/07 | 07/17/07 | 072924 | KAR Labs | Sediment | RA 3A, Grid 6 | PCBs | <0.330 | 5 | None | | |
| [K55256] | | 07/31/07 | 0707258 | TriMatrix Laboratories | | | | 0.21 | | | | |
| K55257 | 07/16/07 | 07/17/07 | 072924 | KAR Labs | Sediment | RA 3A, Grid 7 | PCBs | <0.330 | 5 | None | | |
| K55258 | 07/18/07 | 07/19/07 | 072976 | KAR Labs | Sediment | RA 4A, Grid 1 | PCBs | <0.330 | 5 | None | | |
| K55259 | 07/18/07 | 07/19/07 | | | Sediment | RA 4A, Grid 2 | PCBs | <0.330 | 5 | None | | |
| [K55260] | 07/18/07 | 07/19/07 | | | Sediment | RA 4A, Grid 3 | PCBs | <0.330 | 5 | None | | |
| K55261 | | | | | Sediment | RA 4A, Grid 4 | PCBs | <0.330 | 5 | None | | |
| K55262 | 07/18/07 | 07/19/07 | | | Sediment | RA 4A, Grid 4 | PCBs | <0.330 | 5 | None | | |
| K30627 | 07/19/07 | NR | - | KAR Labs | Surface Water | 300' downstream of RA 4A | PCBs | - | 2e-4 mg/L | None | | |
| K30628 | 07/19/07 | NR | | | Surface Water | 100' upstream of RA 4A | PCBs | - | 2e-4 mg/L | None | | |
| K30629 | 07/19/07 | NR | | | Rinse Blank | - | PCBs | - | 2e-4 mg/L | None | | |
| K55263 ¹ | 07/19/07 | 07/20/07 | 072976 | KAR Labs | Sediment | RA 4A, Grid 6 | PCBs | <0.330 | 5 | None | | |
| [K55263] | | 07/31/07 | 0707349 | TriMatrix Laboratories | | | | 0.14 | | | | |
| K55264 | 07/19/07 | 07/20/07 | 073007 | KAR Labs | Sediment | RA 4A, Grid 7 | PCBs | <0.330 | 5 | None | | |
| K55265 | 07/19/07 | 07/20/07 | | | Sediment | RA 4A, Grid 8 | PCBs | <0.330 | 5 | None | | |
| K55266 | 07/19/07 | 07/20/07 | | | Sediment | RA 4A Grid 9 | PCBs | <0.330 | 5 | None | | |
| K55267 | 07/19/07 | 07/20/07 | | | Sediment | RA 4A Grid 5 | PCBs | 7.5 | 5 | Additional material excavated on July 20 | | |
| K25718 | 07/20/07 | 07/30/07 | 073027 (KAR) / TCRA04 (TAL) | KAR Labs (TPH only) and TAL-Burlington | Soil | Topsoil | TPH, total PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL pesticides | <0.330 | 4 | None, no constituents exceeded action limits | | |
| K55268 | 07/24/07 | 07/25/07 | 073060 | KAR Labs | Sediment | RA 4A, Grid 5 | PCBs | 4.8 | 5 | Additional material excavated on July 26 ² | | |
| K55269 | 07/24/07 | 07/25/07 | | | Sediment | Upland Area 3A1 | PCBs | 2 | 5 | None | | |
| K55270 | 07/24/07 | 07/25/07 | | | Sediment | Upland Area 3A2 | PCBs | 26 | 5 | Additional material excavated on July 27 ³ | | |

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Time-Critical Removal Action - Former Plainwell Impoundment
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Table B — Summary of Samples Collected and Data Received in July 2007

| Sample ID | Sample Date | Data Received | Sample Delivery Group | Laboratory | Sample Matrix | Sample Location | Analysis Conducted | PCB Result (mg/kg) | PCB Action Limit (mg/kg) | Response Action |
|--------------------------------|-------------|---------------|-----------------------|------------------------|---------------|--|-----------------------|--------------------|--------------------------|--|
| K25719 | 07/24/07 | NR | - | KAR Labs | Soil | Access road on City of Plainwell property (200-foot intervals) | PCBs | - | - | |
| K25720 | 07/24/07 | NR | | | Soil | | PCBs | - | - | |
| K25721 | 07/24/07 | NR | | | Soil | | PCBs | - | - | |
| K25722 | 07/24/07 | NR | | | Soil | | PCBs | - | - | |
| K25723 | 07/24/07 | NR | | | Soil | | PCBs | - | - | |
| K25724 | 07/24/07 | NR | | | Soil | | PCBs | - | - | |
| K25725 | 07/24/07 | NR | | | Soil | | PCBs | - | - | |
| K25726 | 07/24/07 | NR | | | Soil | | PCBs | - | - | |
| K25727 | 07/24/07 | NR | | | Soil | Staging Area 2S composite sample | PCBs | - | - | |
| K30630 | 07/26/07 | NR | - | KAR Labs | Surface Water | 300' downstream of RA 4A | PCBs | - | 2e-4 mg/L | None |
| K30631 | 07/26/07 | NR | | | Surface Water | 100' upstream of RA 4A | PCBs | - | 2e-4 mg/L | None |
| K30632 | 07/26/07 | NR | | | Rinse Blank | - | PCBs | - | 2e-4 mg/L | None |
| W_SA1N_Influ_0002 | 07/30/07 | 07/31/07 | 073136 | KAR Labs | Waste Water | Influent Port, Monitoring Point 001A, Staging Area 1N | PCBs, TSS | 0.0001 mg/L | 2e-4 mg/L | None: TSS = 5 mg/L, Action Limit = 45 mg/L |
| W_SA1N_MidA_0002 | 07/30/07 | 07/31/07 | | | Waste Water | Mid-Point Left Side, Monitoring Point 001A, Staging Area 1N | PCBs, TSS | <0.0001 mg/L | 2e-4 mg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L |
| W_SA1N_Efflu_0002 ¹ | 07/30/07 | 07/31/07 | | | Waste Water | Effluent Port, Monitoring Point 001A, Staging Area 1N | PCBs, TSS, Phosphorus | <0.0001 mg/L | 2e-4 mg/L | None: TSS = <4 mg/L, Action Limit = 45 mg/L; P = 0.05, No Action Limit |
| [W_SA1N_Efflu_0002] | | NR | - | TriMatrix Laboratories | | | | - | | - |

Notes:

1 - Split sample collected by USEPA.

2 - No material could be collected at the completion of this excavation, so no confirmation sample was submitted to the laboratory for analysis.

3 - Additional sample scheduled to be collected in August.

NR - Analytical results not yet received

RA - Removal Area

TSS - Total Suspended Solids

P - Phosphorus

* Duplicate samples are shown in brackets

* USEPA split samples are shown in bold and in brackets